

PFE/KMP June 2023
GJ#34

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA)
)
)
v.)
)
ROMAN DEMARCUS DANIELS)

INDICTMENT

COUNT ONE: [18 U.S.C. § 922(a)(6)]

The Grand Jury charges that:

On or about the 12th day of September 2020, in Jefferson County, within the Northern District of Alabama, the defendant,

ROMAN DEMARCUS DANIELS,

in connection with the acquisition of a firearm, that is, **a Glock 9mm pistol, a Cobra .22LR caliber pistol, serial number 125199, and a Cobra .22LR caliber pistol, serial number 125973**, from Gun Prime LLC, doing business as Birmingham Pistol Wholesale, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to an employee of Birmingham Pistol Wholesale, which statement was intended to and likely to deceive an employee of Birmingham Pistol Wholesale, as to a fact material

to the lawfulness of such sale of the said firearms to the defendant under chapter 44 of Title 18 of the United States Code, in that the defendant falsely represented that he was the actual purchaser of the firearms on the Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearm Transaction Record, when, in fact, as he then knew, he was not the actual purchaser of the firearms, in violation of Title 18, United States Code, Section 922(a)(6).

A TRUE BILL

/s/ Electronic Signature
FOREPERSON OF THE GRAND JURY

PRIM F. ESCALONA
United States Attorney

/s/ Electronic Signature
KRISTY M. PEOPLES
Assistant United States Attorney